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Dee May
Director
Federal Regulatory Affairs

Bell Atlantic

April 6, 1999

Ex Parte

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Dockets 97-121, 97-137, 97-208, 97-231

Bell Atlantic met with representatives of the Common Carrier Bureau to discuss the New York Performance Assurance Plan. Additionally, we discussed the statistical bases for the individual measurements contained in that plan. Representing Bell Atlantic were Leslie Vial, Julie Canny, and Mary Batcher and Fritz Scheuren from Ernst & Young. FCC attendees included were Daniel Shiman, Whitey Thayer, Alex Belinfante, Andre Rausch and Florence Setzer. Materials used in the discussion are attached.

Please feel free to call me with any questions.

Sincerely,

Dee May

Attachments

Cc: A. Belinfante
A. Rausch
F. Setzer
D. Shiman

Hypothetical Examples using Typical Sample Sizes

TABLE 1:

STATISTICAL SIGNIFICANCE WITH DIFFERENT SAMPLE SIZES AND CONSTANT PERCENTAGE DIFFERENCE

Performance			Volume		Results	
BA	CLEC	Difference	BA	CLEC	z-score	p-value
95.0%	90.0%	5.00%	200,000	50	-1.60	0.055
95.0%	90.0%	5.00%	200,000	100	-2.24	0.013
95.0%	90.0%	5.00%	200,000	500	-4.89	< 0.00003
95.0%	90.0%	5.00%	200,000	1,000	-6.87	< 0.00001

NOTE: The z-score is the LCUG modified z. Performance differences are fixed at 5%. The p-value indicates if a test statistic is statistically significant. For a one-tailed test, run at a conventional level of .05, significance is achieved if the p-value is less than .05.

TABLE 2:

STATISTICAL SIGNIFICANCE WITH DIFFERENT SAMPLE SIZES AND CONSTANT DIFFERENCE IN MEANS

Performance			Volume		Results	
BA	CLEC	Difference	BA	CLEC	z-score	p-value
23.0	20.0	3.0 hrs	150,000	50	-0.62	0.268
23.0	20.0	3.0 hrs	150,000	100	-0.87	0.192
23.0	20.0	3.0 hrs	150,000	500	-1.95	0.026
23.0	20.0	3.0 hrs	150,000	1,000	-2.76	0.003

NOTE: The z-score is the LCUG modified z. Performance differences are fixed at 3 hours. The p-value indicates if a test statistic is statistically significant. For a one-tailed test, run at a conventional level of .05, significance is achieved if the p-value is less than .05.

TABLE 3:

STATISTICAL SIGNIFICANCE WITH DIFFERENT SAMPLE SIZES AND CONSTANT STATISTICAL SIGNIFICANCE IN PERCENTAGE

Performance			Volume		Results	
BA	CLEC	Difference	BA	CLEC	z-score	p-value
89.9%	95.0%	5.1%	200,000	50	-1.645	0.050
91.4%	95.0%	3.6%	200,000	100	-1.645	0.050
93.4%	95.0%	1.6%	200,000	500	-1.645	0.050
93.9%	95.0%	1.1%	200,000	1,000	-1.645	0.050

NOTE: The z values are fixed at a one-sided .05 level. The magnitude of the minimum difference needed to achieve significance changes as the sample size increases. The p-value indicates if a test statistic is statistically significant.

TABLE 4:

STATISTICAL SIGNIFICANCE WITH DIFFERENT SAMPLE SIZES AND CONSTANT STATISTICAL SIGNIFICANCE IN MEANS

Performance			Volume		Results	
BA	CLEC	Difference	BA	CLEC	z-score	p-value
28.0	20.0	8.0 hrs	150,000	50	-1.645	0.050
25.7	20.0	5.7 hrs	150,000	100	-1.645	0.050
22.5	20.0	2.5 hrs	150,000	500	-1.645	0.050
21.8	20.0	1.8 hrs	150,000	1,000	-1.645	0.050

NOTE: The z values are fixed at a one-sided .05 level. The magnitude of the minimum difference needed to achieve significance changes as the sample size increases. The p-value indicates if a test statistic is statistically significant.

Performance Assurance Plan

Bell Atlantic
New York

Pre-Filing Statement

Update: April 5, 1999

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Overview:

- Background
  - *April 1998: NY Pre-Filing Statement – Section V: Ensuring Continued Performance after InterLATA entry*

- Proposed Performance Assurance Plan – March 1999
  - Mode of Entry
    - Measurements
    - Performance Scoring
    - Performance Credits
  - Critical Measures

- Next Steps

Background:

April 1998 Pre-Filing Statement
Ensuring Continued Performance after InterLATA entry

Two Tracks:

- Overall Performance – Mode of Entry - $75 Million at Risk
  - Three Categories:
    - Resale
    - Unbundled Network Elements
    - Interconnection
  - Aggregated score for each category
  - A miss in the aggregate score triggers adjustments for all CLECs with service in the category

- Critical Measures - $75 Million at Risk
  - 12 Critical Measurements
  - Evaluate Industry Performance and credit CLECs based on their individual performance.

Performance Assurance Plan – March 1999

Mode of Entry:

Modifications to accommodate changes in C2C Guidelines and marketplace experience.

- New Measures and Weights
- Performance Scoring – Statistical Tools
- Dollar Allocations
- Fourth Category – Collocation

Mode of Entry - New Measures and Weights

RESALE		
PO	Pre-Ordering	Weight
1-01	Customer Service Record	15
1-02	Due Date Availability	1
1-03	Address Validation	1
1-04	Product and Service Availability	1
1-05	Telephone Number Availability and Reservation	1
1-06	Facility Availability (Loop Qualification)	1
2-02	OSS System Availability – Prime	20
3-02	% Answered within 30 Seconds – Ordering	10
3-04	% Answered within 30 Seconds – Repair	10
OR	Ordering	
1-02	% On Time LSRC - Flow Through - POTS – 2hrs	20
1-04	% OT LSRC <10 Lines (Elec.- No Flow Through) - POTS	5
1-04	% OT LSRC <10 Lines (Elec.- No Flow Through) - Specials	5
1-06	% On Time LSRC >= 10 Lines (Electronic) – POTS	5
1-06	% On Time LSRC >= 10 Lines (Electronic) – Specials	5
2-02	% On Time LSR Reject - Flow Through – POTS	15
2-04	% OT LSR Rej.<10 Lines (Elec.-No Flow Through)-POTS	15
2-04	% OT LSR Rej.<10 Lines (Elec.-No Flow Through)-Specials	5
2-06	% On Time LSR Reject >=10 Lines (Electronic) - POTS	5
2-06	% On Time LSR Reject >=10 Lines (Electronic) - Specials	5
4-02	Completion Notice - % On Time	15
5-01	% Flow Through - Achieved - POTS & Specials	ud
6-03	% LSRC Accuracy	20
PR	Provisioning	
3-08	% Completed w/in 5 Days (1-5 lines - No Dispatch) - POTS Total	5
3-09	% Completed w/n 5 Days (1-5 lines – Dispatch) - POTS Total	10
4-01	% Missed Appointment - BA - Total – Specials	10
4-02	Average Delay Days - Total – POTS	10
4-02	Average Delay Days - Total – Specials	10
4-04	% Missed Appointment - BA - Dispatch – POTS	10
4-05	% Missed Appointment- BA - No Dispatch – POTS	20
5-01	% Missed Appointment - Facilities – POTS	5
5-01	% Missed Appointment - Facilities – Specials	5
5-02	% Orders Held for Facilities > 15 days – POTS	10
5-02	% Orders Held for Facilities > 15 days – Specials	10
6-01	% Installation Troubles within 30 days – POTS	15
6-01	% Installation Troubles within 30 days – Specials	15
MR	Maintenance & Repair	
1-01	Average Response Time - Create Trouble	1
1-03	Average Response Time - Modify Trouble	1
1-04	Average Response Time - Request Cancellation of Trouble	1
1-06	Average Response Time - Test Trouble (POTS only)	1
2-01	Network Trouble Report Rate (Specials)	10
2-02	Network Trouble Report Rate - Loop (POTS)	10
3-01	% Missed Repair Appointments – Loop	20
3-02	% Missed Repair Appointments - Central Office	5
4-01	Mean Time to Repair – Specials	20
4-02	Mean Time to Repair - Loop Trouble	15
4-03	Mean Time to Repair - CO Trouble	5
4-08	% Out of Service > 24 Hours – POTS	20
4-08	% Out of Service > 24 Hours – Specials	5
5-01	% Repeat Reports w/in 30 days - POTS	15
5-01	% Repeat Reports w/in 30 days - Specials	15
BI	Billing	
1-01	% DUF in 4 Business Days	10
	TOTAL	469

Unbundled Network Elements		
PO	**Pre-Ordering**	**Weight**
1-01	Customer Service Record	15
1-02	Due Date Availability	1
1-03	Address Validation	1
1-04	Product and Service Availability	1
1-05	Telephone Number Availability and Reservation	1
1-06	Facility Availability (Loop Qualification)	1
2-02	OSS Interface Availability – Prime	20
3-02	% Answered within 30 Seconds - Ordering	10
3-04	% Answered within 30 Seconds - Repair	10
OR	**Ordering**	
1-02	% On Time LSRC - Flow Through - POTS - 2hrs	20
1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-POTS	5
1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-Specials	5
1-04	% OT LSRC<10 Lines (Elec.-No Flow Through)-Complex	5
1-06	% On Time LSRC >=10 Lines (Electronic) - POTS	5
1-06	% On Time LSRC >=10 Lines (Electronic) - Specials	5
1-06	% On Time LSRC >=10 Lines (Electronic) - Complex	5
2-02	% On Time LSR Reject – Flow Through - POTS	15
2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-POTS	15
2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Specials	5
2-04	% OT LSR Rej.<10 lines (Elec.-No Flow Through)-Complex	5
2-06	% On Time LSR Reject >= 10 Lines (Electronic) - POTS	5
2-06	% On Time LSR Reject >= 10 Lines (Electronic) - Specials	5
2-06	% On Time LSR Reject >= 10 Lines (Electronic) - Complex	5
4-02	Completion Notice - % On Time	15
5-01	% Flow Through - Simple Achieved - POTS & Specials	**ud**
6-03	% LSRC Accuracy	20
PR	**Provisioning**	
3-08	% Completed w/in 5 Days (1-5 lines-No Dispatch) - Platform & Other	5
3-09	% Completed w/in 5 Days (1-5 lines-Dispatch) - Platform & Other	10
4-01	% Missed Appointment - BA - Total - Specials	10
4-01	% Missed Appointment - BA - Total - EEL	10
4-01	% Missed Appointment - BA - Total - IOF	10
4-02	Average Delay Days - Total - POTS	10
4-02	Average Delay Days - Total - Specials	10
4-02	Average Delay Days - Total - Complex	10
4-04	% Missed Appointment - BA - Dispatch - Platform	10
4-04	% Missed Appointment - BA - Dispatch - New Loop	5
4-04	% Missed Appointment - BA - Dispatch - Complex	5
4-05	% Missed Appointment- BA - No Dispatch - Platform	20
4-05	% Missed Appointment- BA - No Dispatch - Complex	10
4-06	% On Time Performance – Hot Cut	20
5-01	% Missed Appointment – Facilities - POTS	5
5-01	% Missed Appointment – Facilities - Specials	5
5-02	% Orders Held for Facilities > 15 days - POTS	10
5-02	% Orders Held for Facilities > 15 days - Specials	10
6-01	% Installation Troubles within 30 days - POTS Other	15
6-01	% Installation Troubles within 30 days - Specials	15
6-02	% Installation Troubles within 7 days - Loops	15

Unbundled Network Elements - continued		Weight
MR	**Maintenance & Repair**	
1-01	Average Response Time – Create Trouble	1
1-03	Average Response Time – Modify Trouble	1
1-04	Average Response Time – Request Cancellation of Trouble	1
1-06	Average Response Time – Test Trouble (POTS only)	1
2-01	Network Trouble Report Rate	10
2-02	Network Trouble Report Rate - Loop	10
3-01	% Missed Repair Appointments - Loop	20
3-02	% Missed Repair Appointments - Central Office	5
4-01	Mean Time to Repair - Specials	20
4-02	Mean Time to Repair - Loop Trouble	15
4-03	Mean Time to Repair - CO Trouble	5
4-08	% Out of Service > 24 Hours - POTS	20
4-08	% Out of Service > 24 Hours - Specials	5
5-01	% Repeat Reports w/in 30 days - POTS	15
5-01	% Repeat Reports w/in 30 days - Specials	15
BI	**Billing**	
1-02	% DUF in 4 Business Days	10
	TOTAL	574

INTERCONNECTION

OR	Ordering	Weight
1-12	% On Time Firm Order Confirmations	15
1-13	% On Time Design Layout Record (DLR)	10
2-12	% On Time Trunk ASR Reject	10
PR	**Provisioning**	
4-01	% Missed Appointment - BA - Total	20
4-02	Average Delay Days - Total	10
4-07	% On Time Performance - LNP only	20
5-01	% Missed Appointment - Facilities	10
5-02	% Orders Held for Facilities > 15 Days	10
6-01	% Installation Troubles w/in 30 Days	15
MR	**Maintenance & Repair**	
4-01	Mean Time to Repair - Total	20
4-06	% OOS>4 Hrs	20
4-08	% Out of Service > 24 Hours	10
5-01	% Repeat Reports w/in 30 Days	10
NP	**Network Performance**	
1-03	# of Final Trunk Groups Blocked 2 Months	10
1-04	# of Final Trunk Groups Blocked 3 Months	20
	Total	180

Collocation		
NP	Network Performance	Weight
2-01	% On Time Response - Request Physical	10
2-02	% On Time Response - Request Virtual	10
2-05	% On Time - Physical Collocation	20
2-06	% On Time - Virtual Collocation	20
2-07	Average Delay Days - Physical Collocation	20
2-08	Average Delay Days - Virtual Collocation	20
		100

Performance Standards and Scoring

Standards: Carrier to Carrier (C2C) Guidelines

- For performance measures with "parity" standards:
  - Determine Z Score
  - Modified Z score – derived from C2C Guidelines
  - Small Sample Size – Utilize Permutation Tests

- For performance measures with Absolute standards:
  - Range of Performance determines score
  - Small Sample Size – utilize table for scoring

Statistical Formulas:

Measured Variables:	Counted Variables:
$t = \frac{\bar{X}_{CLEC} - \bar{X}_{BA}}{\sqrt{s_{BA}^2 (\frac{1}{n_{CLEC}} + \frac{1}{n_{BA}})}}$	$Z = \frac{\mathcal{P}_{CLEC} - \mathcal{P}_{BA}}{\sqrt{\mathcal{P}_{BA}(1 - \mathcal{P}_{BA})(\frac{1}{n_{CLEC}} + \frac{1}{n_{BA}})}}$

Definitions:

Measured Variables are metrics of means or averages, such as mean time to repair, or average interval.

Counted Variables are metrics of proportions, such as percent measures.

–

X is defined as the average performance or mean of the sample

S^2 is defined as the standard deviation

n is defined as the sample size

p is defined as the proportion, for percentages 90% translates to a 0.90 proportion

A Z or t score of below –1.645 provides a 95% confidence level that the variables are different, or that they come from different processes.

Small Sample Size (Parity Measures)

When Sample is too small utilize Permutation:

For Measures of Percentages: $np(1-p) < 5$
For Measures of Means: < 30

Clustering Exceptions:

A key frailty of using statistics to evaluate parity is that a key assumption about the data, necessary to use statistics, is faulty. On such assumption is that the data is independent. Events included in the performance measures of provisioning and maintenance of telecommunication services are not independent. The lack of independence is referred to as "clustering" of data. Clustering occurs when individual items (orders, troubles etc.) are clustered together as one single event. This being the case, Bell Atlantic will file an exception to the performance scores in the pre-filing backsliding performance if the following events occur:

a.) **Event Driven Clustering: Cable Failure**: If a significant proportion (more than 30%) of a CLECs troubles are in a single cable failure, BA will provide the data demonstrating that all troubles within that failure, including Bell Atlantic troubles were resolved in an equivalent manner. Then, BA will provide the repair performance data with that cable failure performance excluded from the overall performance for both the CLEC and BA and the remaining troubles compared according to normal statistical methodologies.

b.) **Location Driven Clustering: Facility Problems**: If a significant proportion (more than 30%)of a CLECs missed installation orders and resulting delay days were due to an individual location with a significant facility problem, BA will provide the data demonstrating that the orders were "clustered" in a single facility shortfall. Then, BA will provide the provisioning performance with that data excluded. Additional location driven clustering may be demonstrated by disaggregating performance into smaller geographic areas.

c.) **Time Driven Clustering: Single Day Events**: If significant proportion (more than 30%)of CLEC activity, provisioning or maintenance, occur on a single day within a month, and that day represents an unusual amount of activity is in a single day, BA will provide the data demonstrating that the activity is on that day. BA will compare that single day's performance for the CLEC to BA's own performance. Then, BA will provide data with that day excluded from overall performance to demonstrate "parity".

d.) **CLEC Actions**: If performance for any measure is impacted by unusual CLEC behavior, BA will bring such behavior to the attention of the CLEC to attempt resolution. Examples of CLEC behavior impacting performance results include order quality, causing excessive missed appointments, incorrect dispatch identification, resulting in excessive multiple dispatch and repeat reports, inappropriate X coding on orders, where extended due dates are desired, and delays in rescheduling appointments, when BA has missed an appointment. If such action negatively impacts performance, BA will provide appropriate detail documentation of the events and communication to the individual CLEC and the Commission.

Documentation:

BA will provide all details, ensuring protection of customer proprietary information to the CLEC and Commission. Details include, individual trouble reports, and orders with analysis of BA and CLEC performance. For cable failures, BA will provide appropriate documentation detailing all other troubles associated with that cable failure.

Small Sample Size Table for Performance Measures with Absolute Standards:

"Allowable Misses"

95% Standard

Sample Size	Zero weight	0	-1	-2
1	1	0	NA	NA
2	1	0	2	NA
3	1	0	2	3
4	1	0	2	3+
5	1	0	2	3+
6	1	0	2	3+
7	1	0	2	3+
8	1	0	2	3+
9	1	0	2	3+
10	1	0	2	3+
11	1	0	2	3+
12	1	0	2	3+
13	1	0	2	3+
14	1	0	2	3+
15	1	0	2	3+
16	1	0	2	3+
17	1	0	2	3+
18	1	0	2	3+
19	1	0	2	3+
20	-	1	2	3+

90% Standard

Sample Size	Zero weight	0	-1	-2
1	1	0	NA	NA
2	1	0	2	NA
3	1	0	2	3
4	1	0	2	3+
5	1	0	2	3+
6	1	0	2	3+
7	1	0	2	3+
8	1	0	2	3+
9	1	0	2	3+
10	-	1	2	3+
11	2	1	3	4+
12	2	1	3	4+
13	2	1	3	4+
14	2	1	3	4+
15	2	1	3	4+
16	2	1	3	4+
17	2	1	3	4+
18	2	1	3	4+
19	2	1	3	4+
20	-	2	3	4+

Performance Scores for Measures with Absolute Standards:

Measure	0	-1	-2
OSS Response Time	≤ 4 Second Diff.	4.1 to 6 seconds	> 6 seconds
OSS Availability	≥ 99.5%	98 to 99.4%	< 98%
95% standards	≥ 95%	90 to 94.9%	< 90%
Speed of Answer	≥ 80%	75 to 79.9%	< 75%
Collocation Delay Days	≤ 6 Days	7 - 15 Days	> 15 Days
Trunk Blockage (MOE)	≤ 2% of Final Interconnection Trunks exceeding blocking standard for 2 months in a row	> 2% of Final Interconnection Trunks exceeding blocking standard for 2 months in a row	> 2% of Final Interconnection Trunks exceeding blocking standard for 3 months in a row
Trunk Blockage – CM (CLEC specific)	Final Interconnection Trunks meeting or exceeding blocking standard for one month	Any individual Final Interconnection Trunk group exceeding blocking standard for 2 months in a row	Any individual Final Interconnection Trunk group exceeding blocking standard for 3 months in a row

Mode of Entry:

Dollars At risk

	RESALE	UNE	Collocation	TRUNKS
Monthly	$937,500	$3,750,000	$208,333	$1,354,167
Annual	$11,250,000	$45,000,000	$2,500,000	$16,250,000

Mode of Entry Performance Scoring:

For each measure with a "parity" standard:

Step 1:
Calculate Z score or perform permutation (for small samples)

Step 2:
Convert Z score to performance score

Z Score	Performance Score	Parity
$Z \leq -1.645$	-2	Not Achieved [1]
$Z < -0.8225$ and > -1.645	-1	In Question [2]
$Z > -0.8225$	0	Achieved

For each measure with an absolute standard:

Step 1:
Determine Performance Score using performance range tables (for small sample sizes, use small sample size table.

No Step 2

[1] For report rate measures – regardless of z score – if absolute difference is less than 0.1%, the performance score is a 0.

[2] A –1 Performance score will revert to a zero if the two subsequent months have 0 performance scores

Mode of Entry Performance Scoring:

Step 3:
After 2 additional months performance (allowing for adjustments for –1 scores.) Weight performance score for each metric in each MOE

Step 4:
Accumulate total performance score for each MOE. If performance score is ≤ -0.2 go to step 5. Otherwise, no credits due.

Step 5:
Create Performance Credit table. Divide total monthly dollars by lines (units) in service using actual volume for maximum rate. Allocate across 20 performance scores from –0.2 to –X (with 10% of rate at –0.2).

Step 6:
Determine rate from table using score

Step 7:
Calculate credit using rate multiplied by lines in service for each CLEC within that MOE.

Critical Measures – Annual Dollars

Metric		Description	Resale	UNE	Collocation	Trunks
1		**Response Time OSS Interface**	**$1,510,417**	**$4,500,000**		
	PO-1-01	Customer Service Record	x	x		
	PO-1-02	Due Date Availability	x	x		
	PO-1-03	Address Validation	x	x		
	PO-1-04	Product & Service Availability	x	x		
	PO-1-05	TN Reservation	x	x		
	PO-1-06	Facility Availability (Loop Qualification)	x	x		
2	PO-2-02	**OSS Interface Avail. (Prime Time)**	**$1,510,417**	**$4,500,000**		
3	OR-6-03	**% Accuracy LSRC**		**$4,500,000**		
4		**Installation Quality**	**$1,510,417**	**$4,500,000**		**$3,072,917**
	PR-6-01	% Inst. Troubles within 30 Days - POTS	x	X(UNE-P)		
	PR-6-01	% Inst. Troubles within 30 Days -Specials	x	x		
	PR-6-01	% Inst. Troubles within 30 Days - Trunks				x
	PR-6-02	% Install. Troubles within 7 Days - Loops		x		
5a	PR-4-01	**% Missed Appt. - BA - Total - EEL**		**$2,250,000**		
5b		**% Missed Appointments - Complex**		**$2,250,000**		
	PR-4-04	Complex Dispatch		x		
	PR-4-05	Complex No Dispatch		x		
6		**% Missed Appointments**	**$1,510,417**	**$4,500,000**		**$3,072,917**
	PR-4-01	Total - Specials	x	x		
	PR-4-01	Total - Trunks				x
	PR-4-04	Dispatch - POTS	x			
	PR-4-04	Dispatch - Loop - New		x		
	PR-4-05	No Dispatch - POTS	x			
7	PR-4-05	**% Missed Appt. No Disp.- Platform**		**$4,500,000**		
8	PR-4-06	**% On Time Performance Hot Cut**		**$4,500,000**		
9	PR-4-07	**% On Time Performance - UNE LNP**				**$3,072,917**
10		**% Repeat Reports within 30 Days**	**$1,510,417**	**$4,500,000**		**$3,072,917**
	MR-5-01	POTS	x	x		
	MR-5-01	Specials	x	x		x
11		**Mean Time To Repair**	**$1,510,417**	**$4,500,000**		**$3,072,917**
	MR-4-01	Total (Specials\Trunks)	x	x		x
	MR-4-02	Dispatch	x	x		
	MR-4-03	No Dispatch	x	x		
	MR-4-06	% Out of Service > 4 Hours				x
	MR-4-08	% Out of Service > 24 Hours	x	x		
12		**% Final Trunks Groups Blocking**				**$3,072,917**
	NP-1-03	Blocked 2 Months				x
	NP-1-04	Blocked 3 Months				x
13		**Collocation**			**$2,500,000**	
	NP-2-5\6	% Completed on Time - Physical & Virtual			x	
	NP-2-7\8	Average Delay Days - Physical & Virtual			x	
		# Measures / product category	**6**	**11**	**1**	**6**
		Total Dollars At Risk - Annual	**$9,062,500**	**$45,000,000**	**$2,500,000**	**$18,437,500**

x – measure included at weight from MOE measures

Next Steps:

The Value for X